

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RITA NAIDU, an individual.

Plaintiff,

and

GOVERNMENT EMPLOYEES INSURANCE
COMPANY, dba GEICO, a foreign insurer;

Defendants.

CASE NO.

2:22-cv-00587-JCC

STIPULATION TO AMEND
COMPLAINT AND ORDER
THERETO

NOTED FOR HEARING: June 8, 2022

I. STIPULATION

The parties, Plaintiff, Rita Naidu, and Defendant, GEICO Employees Insurance Company¹,
by and through their attorneys of record, hereby stipulate as follows:

1. On April 18, 2022, Plaintiff filed a Summons and Complaint against Defendant in King County Superior Court, under Cause No. 22-2-05591-0 KNT.
2. Defendants filed a Notice of Appearance on April 20, 2022.
3. Defendant was served with the Summons and Complaint on April 21, 2022, through the Insurance Commissioner of the State of Washington.

¹ Defendant GEICO Employees Insurance Company is not the proper Defendant. GEICO Advantage Insurance Company is the proper legal entity. Counsel for Defendant has notified Plaintiff of the incorrect legal entity and this stipulation seeks to correct the error.

4. On May 2, 2022, Defendants filed a Notice of Removal with the United States District Court Western District of Washington, based on diversity of citizenship and the amount in controversy exceeds \$75,000.00. [Dkt. # 1].

5. Counsel for Defendant notified Plaintiff's counsel via the Notice of Removal the proper defendant entity is "GEICO Advantage Insurance Company." Counsel have conferred on the matter and stipulate to an amended pleading, which identifies the proper entity.

6. Counsel for Defendant and Plaintiff have also agreed that, subject to the Court's Order, Counsel for the Defendant will accept service of amended summons and complaint on behalf of GEICO Advantage Insurance Company.

7. Attached hereto as **Exhibit A** is a copy of the proposed amended pleading. The text to be deleted has a strikethrough and the text to be added is highlighted.

STIPULATED TO this 8th day of June, 2022.

BEETHAM TRAN LAW FIRM, PLLC

/s/ **Brett R. Beetham**

Brett R. Beetham, WSBA No. 40584
Beetham Tran Law Firm, PLLC
16627 Benson Rd. S.
Renton, WA 98055
Ph: 425-228-1500
Fax: 425-228-1517
Email: bbeetham@beethamtran.com
Attorney for Plaintiff

WILSON SMITH COCHRAN DICKERSON

/s/ **Alfred E. Donohue**

Alfred E. Donohue, WSBA No. 32774
Wilson Smith Cochran Dickerson
1000 Second Ave., Suite 2050
Seattle, WA 98104-3629
Ph: 206-623-4100
Fax: 206-623-9273
Email: donohue@wscd.com
Attorney for Defendant

II. ORDER

On June 8, 2022, the parties in the above-referenced action filed a Stipulation to Amend Complaint and Order Thereto. The Court having reviewed that stipulation and good cause appearing, orders as follows:

1. The parties' stipulation is approved;
2. Within fourteen (14) days of the filing of this Order, Plaintiff shall file and serve Defendant the amended pleading as provided in **Exhibit A**. Based on the stipulation of the parties, service may be had through the Defendant's counsel of record.

IT IS SO ORDERED

Dated this 13th day of June, 2022


Honorable John C. Coughenour
UNITED STATES DISTRICT COURT JUDGE

1 Presented by:

2 BEETHAM TRAN LAW FIRM, PLLC

3 */s/ Brett R. Beetham*

4

Brett R. Beetham, WSBA No. 40584

5 Beetham Tran Law Firm, PLLC

6 16627 Benson Rd. S.

7 Renton, WA 98055

8 Ph: 425-228-1500

9 Fax: 425-228-1517

10 Email: bbeetham@beethamtran.com

11 Attorney for Plaintiff

12 Approved as to form;

13 Notice of presentation waived:

14 WILSON SMITH COCHRAN DICKERSON

15 */s/ Alfred E. Donohue*

16

Alfred E. Donohue, WSBA No. 32774

17 Wilson Smith Cochran Dickerson

18 1000 Second Ave., Suite 2050

19 Seattle, WA 98104-3629

20 Ph: 206-623-4100

21 Fax: 206-623-9273

22 Email: donohue@wscd.com

23 Attorney for Defendant